

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO

as representative of

THE COMMONWEALTH OF PUERTO  
RICO

Debtor

PROMESA

Title III

No. 17 BK 3283-LTS

Jointly Administered

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**MOTION REQUESTING PARTICIPATION IN AMBAC AND BOARD MEET AND  
CONFER AS TO ASPECTS OF COMMONWEALTH'S FINANCIAL SITUATION OR  
IN THE ALTERNATIVE, TO RECEIVE COPY OF THE DISCOVERY**

**TO THE HONORABLE COURT:**

COME NOW the Salud Integral en la Montaña (SIM) and respectfully states as follows:

1. SIM is an unsecured creditor of the Commonwealth of Puerto Rico. In order to analyse the Commonwealth's disclosure statement and plan of adjustment, SIM needs to have a "basic understanding of mayor aspects of the Commonwealth's financial condition that will be relevant to a plan of adjustment." Hence, SIM requests to be part of the meet and confer in order to contribute to the discussion of what information is important to creditors.

2. In the alternative, SIM wishes to be a recipient of any information, documents, etc. that may result from the aforementioned meet and confer process. SIM is willing to execute any

reasonable confidentiality agreement required by the Commonwealth and the Board. Again, SIM believes the requested information is vital for the understanding of the disclosure statement and the plan of adjustment.

WHEREFORE: the SIM respectfully requests from the Honorable Court that be allowed to join the meet and confer process related to Ambac's Rule 2004 request or in the alternative, be provided with a copy of the information that is produced.

Respectfully submitted on this 26<sup>th</sup> day of January, 2020.

CERTIFY: That on this same day, the ECF system sent a copy of this motion to all parties in this litigation.

/s John E. Mudd  
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